

ALEX G. TSE (CABN 152348)
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

ELISE LAPUNZINA (NYBN 2540730)
S. WAQAR HASIB (CABN 234818)

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
elise.lapunzina@usdoj.gov; 415-436-6878
waqar.hasib@usdoj.gov; 415-436-7261

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 15-00582 WHO
)	
Plaintiff,)	UNITED STATES' EX PARTE APPLICATION
)	AND [PROPOSED] ORDER PERMITTING
v.)	DISCLOSURE OF PRETRIAL SERVICES
)	REPORT AND ADDENDUM
ADAM SHAFI,)	
)	
Defendant.)	
)	
)	

The United States respectfully applies ex parte for an order permitting disclosure of all pretrial services reports in this case. The United States has filed an appeal of this Court's reconsideration of its pretrial detention order with the United States Court of Appeals for the Ninth Circuit. In order to adequately brief the appeal and to provide a complete record to the Court of Appeals, the United States asks that this Court order Pretrial Services to provide a copy of any Pretrial Services reports and their addenda to counsel for the United States and the defendant for use during the appeal. The United States further requests this Court order that counsel for the United States or the Pretrial Services Office may file a copy of the pretrial services reports in the Ninth Circuit and that any filing of the reports and their addenda with respect to the appeal be made under seal.

1 Accordingly, the United States moves this Court to issue an order that Pretrial Services provide
2 a copy of all pretrial services reports and their addenda in this case to counsel for the United States and
3 the defense for use in the pending appeal of this Court's detention order. Defendant's counsel does not
4 object to the United States' request.

5
6 DATED: November 13, 2018

Respectfully submitted,

7 ALEX G. TSE
8 United States Attorney

9 _____/s/_____
10 ELISE LAPUNZINA
11 S. WAQAR HASIB
12 Attorneys for the United States of America
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

[PROPOSED] ORDER

Having considered the United States' Application for an Order Permitting the Disclosure of Pretrial Services Report and Addendum, it is hereby ORDERED that: (1) Pretrial Services shall provide copies of the pretrial services reports and their addenda in this case to the attorneys for the United States and defendant which shall be returned to Pretrial Services at the conclusion of the appeal; (2) counsel for the United States or the Pretrial Services Office may file a copy of the pretrial services reports in the Ninth Circuit; and (3) any filing of the reports and their addenda with respect to the appeal shall be made under seal.

DATED: _____

HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE